



New York
White Plains Plaza
One North Broadway
White Plains, NY 10601-2310

914 997-0500 Telephone
914 997 0035 Fax

www.lowey.com

Pennsylvania
Four Tower Bridge
200 Barr Harbor Drive, Suite 400
West Conshohocken, PA 19380-2977

610-941-2760 Telephone
610-862-9777 Fax

June 10, 2013

VIA FACSIMILE 914-390-4166

Honorable Vincent L. Briccetti
United States District Court Judge
United States Courthouse
300 Quarropas Street, Room 630
White Plains, NY 10601

Re: *Miller v. Wells Fargo, et al.* 13-cv-1541 (VB)

Dear Judge Briccetti:

We represent Plaintiff Wayne Miller in the above-referenced class action. Pursuant to Section 2.C.i. of Your Honor's Individual Practices, we write to request permission to file one omnibus memorandum of law not to exceed sixty (60) pages in opposition the two motions to dismiss filed by Defendants Wells Fargo Bank, N.A., Wells Fargo Insurance, Inc., Assurant, Inc., and American Security Insurance Company (together "Defendants").

Good cause exists to extend the page limit extension. Plaintiff is combining what would have been two 25-page opposition briefs. In addition, Plaintiff's omnibus memorandum of law will be responding to the two motions to dismiss filed by Defendants, which were collectively in excess of sixty (60) pages, not including three declarations and 17 exhibits. Also, Defendants' motions to dismiss the complaint raise numerous complex issues that call for detailed responses. The additional pages requested will permit Plaintiff to adequately and succinctly respond to these arguments and assist the court in resolving the motion to dismiss.

Defendants do not oppose this request.

Respectfully submitted,

A handwritten signature in black ink that reads 'Scott V. Papp'.

Scott V. Papp
Direct Line: 914-733-7257

cc: Lisa J. Fried (via facsimile)
Andrew T. Solomon (via facsimile)

APPLICATION DENIED
SO ORDERED:
W322
Vincent L. Briccetti, U.S.D.J.
Dated: *2/11/13*
White Plains, NY
Plaintiff's brief may not exceed 45 pages in length.